

EXHIBIT D

1 A. I know that.

2 Q. Okay. And -- but based on your Complaint, I
3 think that you've also sued him in what lawyers call
4 his individual capacity; so not only with his
5 executive director of TIGHAR hat on and the
6 organization title, but Ric Gillespie as he's not
7 associated with TIGHAR, okay?

8 A. Yes.

9 Q. Do you understand what I'm saying about --

10 A. Yes.

11 Q. Okay. And would you agree that you have
12 sued him in his individual capacity, as well?

13 A. Yes.

14 MR. STUBSON: Objection to the extent that
15 it calls for a legal conclusion.

16 BY MR. MASTERSON:

17 Q. Okay. Can you articulate for me what you
18 believe Mr. Gillespie, as a civilian, did to you
19 separate and apart from his role in TIGHAR?

20 A. Well, it's my belief that you can't separate
21 the two. That's part of the problem with an
22 organization such as TIGHAR where the individual
23 becomes the organization, and vice versa, and the
24 persona is essential to the organization, but
25 obviously survives as a separate entity outside.

1 Q. Did he do anything in your contact with him
2 that was not under that TIGHAR auspices?

3 A. Well, we'd eat meals together, you know,
4 talk about other matters.

5 Q. Okay. Any of the allegations you've made
6 against him in the Complaint not under TIGHAR
7 auspices? Wasn't he always acting as the executive
8 director of TIGHAR?

9 MR. STUBSON: Objection, calls for
10 speculation, but you can answer.

11 A. My opinion is that Mr. Gillespie was looking
12 out for Mr. Gillespie and Mrs. Gillespie to a fair
13 extent, and whatever else he did as TIGHAR was part
14 of TIGHAR. It was -- a component of it was not
15 TIGHAR, it was Mr. Gillespie and Mrs. Gillespie.

16 Q. And what component was that?

17 A. Earning a living.

18 Q. So the fact that he draws a salary from
19 TIGHAR?

20 A. Yeah, well, amongst other benefits, yes.

21 Q. Can you tell me any actions that he took as
22 an individual in the Complaint as opposed to acting
23 as TIGHAR's executive director?

24 A. I think he raised money in TIGHAR's name but
25 used substantial parts of it for his own benefit,

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1 personal benefit.

2 Q. And in -- what personal benefit would that
3 have been?

4 A. To maintain his lifestyle, I suppose you
5 would call it.

6 Q. And that personal benefit, then, is through
7 his compensation with TIGHAR?

8 A. Yes.

9 Q. Whether that's the salary or the benefits,
10 or whatever?

11 A. Yes, sir.

12 Q. You're not saying that he skimmed money
13 outside -- you know, that he shouldn't have, off of
14 TIGHAR, you just disagree with his compensation
15 scheme?

16 A. Yes, considering it's a non-profit
17 organization.

18 Q. As far as you know, was your gift used for
19 the 2012 expedition?

20 A. I believe it was.

21 Q. Do you have any reason to believe it went
22 for any other purpose?

23 A. Well, it went in part for the running of
24 TIGHAR, I'm sure.

25 Q. Okay.

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